

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA

v.

JAMES MAHON IV,

Defendant.

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Case No. 3:24-CR-158

**DEFENDANT JAMES MAHON IV'S
MOTION TO CONTINUE**

Defendant, James Mahon IV ("Mr. Mahon"), by and through undersigned counsel, hereby respectfully requests that this Honorable Court continue all deadlines in this case, including Mr. Mahon's trial which is currently scheduled to begin on August 26, 2024. In support of his motion, Mr. Mahon states as follows:

1. On June 25, 2024, the Government obtained an Indictment in this case.
2. Mr. Mahon has not yet received any discovery in this case and undersigned counsel for Mr. Mahon will require more time to review the discovery, conduct their own investigation and prepare for trial.
3. Even with the exercise of due diligence, undersigned counsel will not be prepared to file motions or prepare for trial in August. A failure to grant a continuance would deny undersigned counsel the reasonable time necessary for effective preparation, due to counsel's need for more time to review the evidence, consider possible defenses, and gather evidence material to the defense, as set forth in 18 U.S.C. § 3161(h)(7)(B)(iv).
4. Failure to grant a continuance would further likely result in a miscarriage of justice, as set forth in 18 U.S.C. § 3161(h)(7)(B)(i).

5. The additional time requested is a reasonable period of delay, particularly in view of the complex nature of the case—which apparently involves many years and a large number of witnesses. Counsel requires more time to prepare for trial, to investigate the matter, to gather evidence material to the defense, and to consider possible defenses.

6. Counsel for the Government does not oppose the request for a continuance.

7. Furthermore, Rule 17.1 provides that a court may, in its discretion, hold one or more pretrial conferences to promote a fair and expeditious trial. Because of the strong public and private interest in a prompt and orderly resolution of the issues in this case, Mr. Mahon respectfully requests that the Court schedule a status conference at its earliest convenience to schedule a new trial date.

For the foregoing reasons, Defendant James Mahon IV respectfully requests that the Court grant his motion and continue the deadline for filing motions for 90 days and continue the trial currently scheduled to begin on August 26, 2024.

Dated: July 10, 2024

Respectfully Submitted,

/s/ Dennis E. Boyle

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Counsel for Defendant James Mahon IV

CERTIFICATE OF SERVICE

I hereby certify that on this 10th day of July 2024, I electronically filed the foregoing with the Court using the CM/ECF system which served a copy on all parties.

/s/ Dennis E. Boyle

Dennis E. Boyle